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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

AJAY BAHL,
Plaintiff,

v.

NEW YORK COLLEGE OF OSTEOPATHIC MEDICINE OF NEW YORK INSTITUTE OF
TECHNOLOGY,
Defendant.

Case No.: 14-CV-4020 (DC)

PLAINTIFF'S MOTION TO DELAY ENTRY OF FINAL JUDGMENT

INTRODUCTION

Plaintiff, Ajay Bahl, respectfully moves this Court for an order delaying the entry of final judgment to allow sufficient time to secure new counsel and prepare necessary post-trial motions. This request follows the recent motion by Plaintiff's attorney to withdraw representation immediately following the trial.

BACKGROUND

1. Trial and Defense Verdict:

- Plaintiff recently concluded a trial in this Court, resulting in a defense verdict on the issue of disability discrimination.

2. Attorney's Motion to Withdraw:

- On June 17, 2024 Plaintiff's attorney filed a motion to withdraw representation the day after the trial concluded. If granted, this motion would leave Plaintiff without legal representation during a critical period for filing post-trial motions.

3. Duration of the Case:

- This case has been pending for over ten years, involving complex issues and extensive litigation history, necessitating continuity and adequate preparation time.

ARGUMENT

1. Prejudice to Plaintiff:

- Immediate withdrawal of Plaintiff's attorney would significantly prejudice Plaintiff by impairing his ability to timely file a motion for a new trial under Rule 59 and a renewed motion for judgment as a matter of law under Rule 50(b). Both motions must be filed within 28 days after the entry of judgment.

2. Judicial Discretion and Fairness:

- The Court has the discretion to manage its docket and ensure fairness. Given the complexity

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and duration of this case, a delay in the entry of final judgment is warranted to provide Plaintiff adequate time to secure new counsel and prepare necessary post-trial motions.

3. Request for Extension:

- Plaintiff respectfully requests that the Court delay the entry of final judgment for a period of 90 days. This extension would provide Plaintiff with sufficient time to secure new legal representation and file appropriate post-trial motions, ensuring that his rights are protected and that he has a fair opportunity to seek relief.

CONCLUSION

For the reasons stated above, Plaintiff respectfully requests that this Court grant his motion to delay the entry of final judgment to ensure that Plaintiff has a fair opportunity to seek post-trial relief and is not unduly prejudiced by the immediate withdrawal motion of his current attorney.

Respectfully submitted,